

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALEXANDRA AVCHUKOV, QUENTIN  
CHAPPAT, SANDRA MAESTRA PEREIRA,  
KRIS IYER, ANTHONY PALIE, DAKOTA  
BEDELL, CARL CORBO, ANNABEL  
GOULD, DOLORES THOMPSON,  
BRIDGETTE WINKELMANN, BILLY TING,  
DUOC VO, GARRY HUANG, JEFFREY  
HANG, JOSHUA CHIN, and WILLY NGO, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

- against -

AVANT GARDNER, LLC, EZ FESTIVALS,  
LLC, MADE EVENT, LLC and JURGEN  
BILDSTEIN,

Defendants.

Civil Action No. 1:23-cv-08106-MMG

**DECLARATION OF PATRICK M.  
KENNELL IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS  
CERTAIN DEFENDANTS AND COUNTS  
OF THE AVCHUKOV COMPLAINT**

**(Oral Argument Requested)**

**PATRICK M. KENNELL**, an attorney duly licensed to practice law before the Courts of the State of New York and admitted before this Court, declares under the penalty of perjury in accordance with 28 U.S.C. § 1746 the following:

1. I am a Partner with the law firm of Kaufman Dolowich, attorneys for Defendants AVANT GARDNER, LLC, EZ FESTIVALS, LLC, MADE EVENT, LLC and JURGEN BILDSTEIN in the above action. I respectfully submit this Declaration in support of Defendants' Motion to Dismiss Certain Defendants and Counts of the Avchukov Complaint.

2. Attached to this Declaration as **Exhibit 1** is a true and correct copy of the Limited Liability Company Agreement of EZ Acquisition LLC, dated April 19, 2022, along with a Certificate of Amendment, dated May 25, 2022, amending the LLC's name to EZ Festivals LLC.

3. Attached to this Declaration as **Exhibit 2** is a true and correct copy of a pre-motion letter, dated February 15, 2024, from the Defendants' counsel to the Avchukov Plaintiffs' counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2024 in New York, New York.

/s/ Patrick M. Kennell

PATRICK M. KENNEL